

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ROBERT VOORHEES,

Plaintiff,

v.

EDUCATIONAL COMMISSION FOR
FOREIGN MEDICAL GRADUATES,

Defendant.

Civil Action No. 2:19-cv-01761-JD

**DEFENDANT’S MOTION FOR LEAVE TO FILE A
REPLY MEMORANDUM OF LAW IN FURTHER SUPPORT OF
ITS MOTION TO DISMISS PLAINTIFF’S COMPLAINT**

Pursuant to Judge DuBois’s Policies and Procedures, Defendant Educational Commission for Foreign Medical Graduates (“Defendant”) respectfully moves for leave to file a reply memorandum of law (the “Reply”) in further support of its Motion to Dismiss Plaintiff’s Complaint (Dkt. 6) (“Defendant’s Motion”). The proposed Reply is attached hereto as **Exhibit A**.

In support of this motion, Defendant states as follows:

1. On July 3, 2019, Plaintiff filed a Memorandum of Law in Opposition to Defendant’s Motion (“Plaintiff’s Opposition”). Dkt. 9.
2. Defendant believes that the Reply is necessary to correct misstatements of fact and law in Plaintiff’s Opposition and that consideration of the Reply will allow this Court to make a fully informed decision on Defendant’s Motion;
3. A hearing on Defendant’s Motion has not yet been scheduled and, therefore, consideration of the Reply would not delay this Court’s decision on Defendant’s Motion;

4. The proposed Reply is attached to this motion as **Exhibit A**.

WHEREFORE, Defendant respectfully seeks leave to file a Reply Memorandum of Law in support of Defendant's Motion to Dismiss Plaintiff's Complaint.

Dated: July 15, 2019

Respectfully submitted,

/s/ Anne E. Martinez

Anne E. Martinez (Pa. ID No. 201189)

Sean R. Caulfield (Pa. ID No. 322461)

MORGAN, LEWIS & BOCKIUS LLP

1701 Market Street

Philadelphia, PA 19103

Phone: 215.963.5000

Fax: 215.963.5001

Email: anne.martinez@morganlewis.com

sean.caulfield@morganlewis.com

Attorneys for Defendant

Educational Commission For Foreign

Medical Graduates